

# 902

## Clear Floor Space for Dining and Work Surfaces

**CHANGE TYPE:** Modification

**CHANGE SUMMARY:** Two new exceptions are provided to eliminate the requirement for knee and toe space beneath small drink counters or furnishings where the element is not intended to function as a table for forward approach.

### 2009 STANDARD:

#### 902 Dining Surfaces and Work Surfaces

**902.1 General.** Accessible dining surfaces and work surfaces shall comply with Section 902.

**Exception:** Dining surfaces and work surfaces primarily for children's use shall be permitted to comply with Section 902.5.

**902.2 Clear Floor Space.** A clear floor space complying with Section 305, positioned for a forward approach, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

#### Exceptions:

1. At drink surfaces 12 inches (305 mm) or less in depth, knee and toe space shall not be required to extend beneath the surface beyond the depth of the drink surface provided.
2. Dining surfaces that are 15 inches (380 mm) minimum and 24 inches (610 mm) maximum in height are permitted to have a clear floor space complying with Section 305 positioned for a parallel approach.



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**902.3 Exposed Surfaces.** There shall be no sharp or abrasive surfaces under the exposed portions of dining surfaces and work surfaces.

**CHANGE SIGNIFICANCE:** The two new exceptions provide relief from the requirement for knee and toe space to be provided beneath an element. These types of elements are not really designed or intended to function as a table, dining, or work surface but often can be viewed that way. As an example of the type of elements covered by Exception 1, consider a small countertop or ledge that is placed along the wall in a standing area of a bar or club. These drink ledges are often only a few inches in depth and are used simply as a place to set a drink or a plate of appetizers down. They are not intended to be used in a forward approach where someone would need to be able to get their knees beneath the element. If the knee and toe clearance were to be required beneath the element, then based on the requirements of Section 306, the minimum depth of the ledge would need to be at least 17 inches. Increasing the depth of the element would only increase the likelihood that it would be used by a forward approach; therefore the standard imposes a 12-inch limit to help distinguish when the exception applies.

Another problem that would arise by requiring the knee and toe clearance is that the clearance beneath the element would be required to be at least 27 inches above the floor. In situations where the drink ledge is attached to a guard at the front of an assembly seating area, this would mean that the height of the drink ledge would be required to be raised above the 26-inch guard height that is allowed by the building code. The IBC allows this lower guard height so the view from the first row of seats is not obstructed.

The second exception can be used for items such as the low side tables that are often found adjacent to lounge chairs in waiting areas of clubs or in the lobby of a hotel. Many times these tables are used as a location to place drinks and snacks but are not truly used as a dining surface. By requiring a parallel-approach clear floor space and also limiting the height, this exception provides a reasonable degree of accessibility while providing guidance for an accessible side table or possibly maintaining sight lines when they are used in an assembly seating area.

The addition of Section 902.3 addresses a requirement not previously covered in the standard. This requirement is conceptually similar to sections dealing with elements beneath cooktops, sinks, or lavatories and is intended to prevent harm to users who place their legs beneath an element. Regardless of the type of element, it is reasonable that there not be any sharp or abrasive surfaces exposed beneath it. Adding this text here extends this requirement to dining and work surfaces to specifically address this danger.